

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

WILLIAM SZYMCZAK, STEFAN SCHUELE,  
KIM DREHER, MARIO LOPEZ, MELANIE  
RIVERA, KATRINA BOYD,  
ANGELA GREATHOUSE,  
CORNELIUS JACKSON, DAVID  
SIMONS, LOLITA DILLARD, and  
ANNE STEWART, individually and  
on behalf of others similarly situated,

Plaintiffs,

-against-

NISSAN NORTH AMERICA, INC.,  
and NISSAN MOTOR CO., LTD.,

Defendants.

Civil Action Number:  
10-CV-07493(VB)

**NOTICE OF  
MOTION**

**Document Filed  
Electronically**

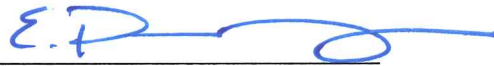
**PLEASE TAKE NOTICE** that, upon the annexed affirmation of E. Paul, Cauley, Jr., sworn to this 28th day of February 2012, and the accompanying Memorandum of Law, Defendants, NISSAN NORTH AMERICA, INC. (“NNA”) and NISSAN MOTOR CO., LTD. (“NML”), subject to and without waiving its objection to jurisdiction, by its counsel will move this Court before the Honorable Vincent Bricetti, at the United States Courthouse at 300 Quarropas Street, White Plains, NY 10601-4150, on a date and time to be determined by the Court, for an Order to stay the instant proceedings while the United States Judicial Panel on Multidistrict Litigation (“the JPML”) considers a motion to transfer and consolidate this case and two other virtually identical putative class actions pending in federal district courts around the country, together with such other and further relief as to this Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, answering affidavits and/or memoranda are to be served upon the undersigned in accordance with Local Rule 6.1(b).

Dated: Dallas, Texas  
February 28, 2012

Yours, etc.,

By:



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